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9 *Google Inc.*

10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**

14 IN RE: HIGH-TECH EMPLOYEE
15 ANTITRUST LITIGATION

16 THIS DOCUMENT RELATES TO:
17 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF LASZLO BOCK IN
SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL DECLARATION
OF WILLIAM CAMPBELL IN
SUPPORT OF GOOGLE'S
OPPOSITION TO PLAINTIFFS'
MOTION TO COMPEL GOOGLE
DOCUMENTS AND THE**

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22 I, Laszlo Bock, declare:

23 1. I am Senior Vice President of People Operations at Google Inc. ("Google"). I
24 have personal knowledge of the facts set forth in this Declaration and, if called to testify, could
25 and would competently thereto.

26 2. I joined Google in April 2006 as Vice President of People Operations and since
27 March 2007 I have served as Senior Vice President of People Operations. As Senior Vice
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1 President of People Operations, I manage and am responsible for all aspects of human resources
2 for Google worldwide. Accordingly, I am familiar with Google's internal decision-making
3 process and business strategy relating to hiring and compensation.

4 3. As part of my responsibilities, I am also familiar with the details of the unique
5 role that William Campbell fulfills in his capacity as a senior advisor for Google's management
6 and Board of Directors, including the details and terms of the business arrangement between
7 Google and Mr. Campbell regarding his role at Google.


8 4. I have read and reviewed the Declaration of William Campbell in Support of
9 Google's Response to Plaintiffs' Motion to Compel ("Campbell Declaration") and Exhibits A
10 and B attached to the Campbell Declaration. The Campbell Declaration and accompanying
11 Exhibits A and B contain in their entirety highly confidential and sensitive information related to
12 the unique business arrangement between Mr. Campbell and Google regarding his role as a
13 senior advisor to Google, including how this arrangement was formalized and documented, as
14 well as the details and express terms and conditions of that arrangement (such as the specific
15 manner in which Mr. Campbell has been, and continues to be, compensated for his work as a
16 senior advisor to Google). This type of information is confidential and closely held within
17 Google and available only to select members of Google's senior management and legal
18 department.

19 5. If the Campbell Declaration and accompanying Exhibits A and B were made
20 public, Google would suffer competitive harm because Google's competitors would discover,
21 and therefore better understand, the unique and confidential arrangement between Mr. Campbell
22 and Google regarding his role as senior advisor to Google, including how this arrangement was
23 formalized and documented and the details and express terms and conditions of that arrangement
24 (such as the specific manner in which Mr. Campbell has been, and continues to be, compensated
25 for his work as a senior advisor to Google).

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on January 24, 2013 in Mountain View, California.
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4 
5 Laszlo Bock
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